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MEMO ENDORSED

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The Honorable Valerie E. Caproni
United States District Court Judge for the Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Donte Goulbourne* et al, 23-cr-00544 (S.D.N.Y.)

Dear Judge Caproni:

On behalf of Donte Goulbourne, a defendant in the above-captioned case, we respectfully request that his curfew be extended on September 8, 2024, from 8 p.m. to 2 a.m. to allow him to attend a concert at Oracle Lounge, 2937 Atlantic Avenue, Brooklyn, New York 11207. Mr. Goulbourne has a long-standing relationship with the artist who will be performing, Kenzo B. She was a client of his when he was working in the music business. Pretrial does not consent to this request, and the Government has deferred to Pretrial.

Thank you for your consideration of this request.

Respectfully Submitted,

Michael J. Gilbert
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: Connie Dang, Assistant U.S. Attorney
Laura Gialanella, U.S. Pretrial Services Officer

Application DENIED.

The Clerk of Court is respectfully directed to terminate the open motion at Dkt. 88.

SO ORDERED.

9/5/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE